

# SDMS US EPA Region V

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1968 Summary of Broke Production - Bates Number KAL000031-KAL000033

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Susan R. Chema  
Chief Litigation Counsel

June 10, 2003

**VIA MESSENGER**


Ms. Eileen L. Furey  
Associate Regional Counsel (C-14J)  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604-3507

**Re: NCR Corporation's Response to the Request for Information Concerning the Allied Paper/Portage Creek/Kalamazoo River Superfund Site**

Dear Ms. Furey:

This letter, the attached document, and the accompanying documents constitute the response of NCR Corporation to the U.S. Environmental Protection Agency's April 8, 2003 Information Request concerning the Kalamazoo River in Michigan.

Sincerely,



Susan Chema

**RESPONSE OF NCR CORPORATION  
TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S  
REQUEST FOR INFORMATION, DATED APRIL 8, 2003**

NCR Corporation ("NCR") hereby responds to the April 8, 2003 Request for Information ("Information Request") from the United States Environmental Protection Agency ("EPA"), received by NCR on April 11, 2003.

NCR expressly denies any liability for alleged response costs, damages to natural resources, restoration costs, or other damages or costs arising out of alleged contamination of the Kalamazoo River area. Nothing in the following responses to the Information Request should be construed as a waiver of any defenses that may be available to NCR, including but not limited to defenses under any state or federal statute, judicial decision, rule, regulation or policy.

Subject to and without waiving any of the objections stated subsequently in this Response, NCR responds as follows:

**GENERAL RESPONSE**

Carbonless copy paper coated with emulsions containing PCBs ("PCB-containing CCP") was manufactured at two plants owned by NCR: a paper coating plant in Appleton, Wisconsin ("Appleton Plant") and a paper mill in Combined Locks, Wisconsin ("Combined Locks mill"). NCR acquired the Appleton Plant in 1970 and the Combined Locks mill in 1969. In 1978, both facilities were sold to Lenthier, Inc., which subsequently changed its name to Appleton Papers Inc.

Although some trial runs may have occurred earlier, PCB-containing CCP was first manufactured commercially at the Appleton Plant in 1954. PCB-containing CCP was manufactured at the Combined Locks mill on a handful of dates between 1964 and 1966 and then again beginning in late 1969. Production of PCB-containing CCP was discontinued at both the Appleton Plant and the Combined Locks mill no later than April of 1971.

In terms of production, the enclosed documents (KAL000001-KAL000136) contain the best information and data available to NCR concerning the amount of PCB-containing CCP and PCB-containing CCP broke manufactured at the Appleton Plant and the Combined Locks mill.

In terms of broke sales, NCR has been unable to locate any records or other documentation reflecting the amounts or dates of purchases by wastepaper brokers of PCB-containing CCP broke produced at the Appleton Plant or the Combined Locks mill. However, the personnel responsible for selling broke specifically recall that all PCB-containing CCP broke produced at these two facilities was sold to brokers or recycle mills for valuable consideration.

In response to the Information Request, NCR conducted a diligent search to try to locate records or other documentation evidencing sales of PCB-containing CCP broke from the

Appleton Plant or the Combined Locks mill specifically to secondary fiber mills in the Kalamazoo, Michigan area. No records were found. This is because there were no such sales. The information in NCR's possession indicates that the PCB-containing CCP broke produced at the Appleton Plant and the Combined Locks mill was sold to and used by paper mills located along the Lower Fox River. The Wisconsin Department of Natural Resources reached the same conclusion when it researched this issue in the late 1990s. See Technical Memorandum 2d, "Compilation and Estimation of Historical Discharges of Total Suspended Solids and Polychlorinated Biphenyls from Lower Fox River Point Sources," Draft dated February 23, 1999.

As you are aware, NCR has already produced thousands of pages of documents to the Department of the Interior and EPA in connection with the Fox River matter. These productions contain all the documents in NCR's possession concerning the manufacture and handling of PCB-containing CCP and PCB-containing CCP broke at the Appleton Plant and the Combined Locks mill. EPA may wish to consult this publicly-available information as part of its investigation if it requires additional information concerning the production of PCB-containing CCP at either of these locations.

### **SPECIFIC RESPONSES**

#### **Request No. 1:**

Identify any facility owned or operated by NCR Corporation that produced NCR paper coated with emulsions containing PCBs; the month and year when NCR paper coated with any emulsion containing PCBs was first produced at each such facility; the month and year when NCR paper coated with any emulsion containing PCBs was last produced at each such facility; the amount of finished NCR paper shipped from each such facility annually; and the amount of broke generated by each such facility mill annually.

#### **Response to Request No. 1:**

Please see the General Response.

#### **Request No. 2:**

Identify each shipment of NCR paper broke that was sent, directly or indirectly through a waste paper broker, from NCR Corporation to any of the secondary fiber pulp and paper mills located within the Kalamazoo River area of Michigan. For each such shipment, identify: (a) the date (month and year) of the shipment; (b) the amount (in pounds) of NCR paper broke shipped; and (c) the name and address of the entity to which the shipment was sent.

#### **Response to Request No. 2:**

Please see the General Response.

Request No. 3:

Provide the dates (month and year) and amounts in pounds of NCR paper broke shipped from NCR Corporation, either directly or indirectly, to company-owned waste paper brokers and to other waste paper brokers.

Response to Request No. 3:

NCR is not aware of the existence of company-owned waste paper brokers. In addition, please see the General Response.

Request No. 4:

To the extent available, provide the current names, addresses and phone numbers for each waste paper broker to which NCR paper broke was shipped from NCR Corporation during the relevant period.

Response to Request No. 4:

Some or all of the following wastepaper brokers may have purchased PCB-containing CCP broke from the Appleton Plant or the Combined Locks mill:

Leo Golper  
Golper Supply Co.  
1810 W. Edgewood Drive  
Appleton, WI 54913  
920-731-3266

National Fiber Supply Co.  
55 E. Monroe St.  
Chicago, IL 60603  
312-346-4800

Continental Paper Grading Co.  
1623 S. Lumber St.  
Chicago, IL 60616  
312-226-2010

Pioneer Paper Stock (now Smurfit Recycling)  
8182 Maryland Avenue  
St. Louis, MO 63105  
314-746-1100

International Cellulose, Inc.  
3110 W. 28<sup>th</sup> St.  
Chicago, IL 60623  
773-847-8000

Donco Paper Supply Co.  
2050 Riverside Drive  
Green Bay, WI 54301  
920-432-7900

U.S. Paper Supply  
(NCR does not have contact information)

Menasha Mill Supply  
(NCR does not have contact information)

In addition, please see the General Response.

### **OBJECTIONS**

1. NCR objects to the Information Request to the extent it seeks information that is not relevant to alleged contamination in the Kalamazoo River area and is not calculated to lead to the discovery of relevant information.
2. NCR objects to the Information Request to the extent it seeks information beyond the scope of the categories of information set forth in Section 104(e)(2).
3. NCR objects to Requests 1, 3 and 4 to the extent they are not restricted by geographic area to the Kalamazoo River.
4. NCR objects to the Information Request to the extent it seeks information concerning papers or broke that did not contain PCBs. NCR has interpreted the Information Request as referring only to PCB-containing CCP and PCB-containing CCP broke.
5. NCR objects to the Information Request to the extent it is unduly burdensome, oppressive, overbroad, and unreasonable.
6. NCR objects to the Information Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product rule, or any other applicable privilege or rule that protects such information from disclosure.
7. NCR objects to the Information Request to the extent it seeks information or documents already in the public domain or already in the possession of EPA or any other federal agency.

8. NCR objects to certain terms and phrases used in the Information Request, including “produced,” “NCR Paper broke,” and “relevant time period,” on the ground that they are ambiguous and subject to multiple interpretations.

### **CONFIDENTIALITY REQUEST**

Please note that some of the attached documents contain information that Appleton Papers Inc. considers proprietary and trade secret. Accordingly, documents labeled KAL000060-KAL000136 have been designated as Confidential Business Information. We request that these documents be treated as confidential, pursuant to 40 C.F.R. Part 2. We have attached a Confidentiality Request and Justification.

Dated: June 10, 2003

## **CONFIDENTIALITY REQUEST AND JUSTIFICATION**

Confidential status is respectfully requested for documents KAL000060-KAL000136. Appleton Papers Inc. has informed NCR that it believes that these documents contain confidential production and process information. Confidential treatment is therefore requested for such time period until the information enters the public domain without breach of any obligation of confidentiality.

According to Appleton Papers Inc., this confidential information is not publicly available information and is not disclosed outside of a confidential relationship. Employees with access to this confidential information have signed a confidentiality agreement wherein they agree not to disclose such information. Additionally, office and research facilities have electronic key card access and mill locations have full-time entry way guards. Employees are issued identification badges and requested to challenge anyone without one. Outside of appropriate confidential relationships, this confidential information is not ascertainable by proper means by persons who can obtain economic value from its use.

Appleton Papers Inc. has informed NCR that disclosure of this confidential information would provide competitors with valuable information as to production processes, customers, and chemical research. In the competitive marketplace, capital investment and being the lowest cost producer are critical success factors for survival. Unrestricted release of confidential information would provide unfair advantages to competitors. No legitimate interests are served by wrongful release of this confidential information.

Disclosure of confidential information will impair the government's ability to obtain such information in the future. The quality of the information available to the Agency will suffer if the Agency does not respect its obligation to appropriately handle sensitive business information.

For the foregoing reasons, confidential status is respectfully requested for the identified documents.

June 10, 2003





APPLETON PAPERS INC.

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1-96-111	1 of 1
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. F. McKinney	

## COMPANY POLICY

SUBJECT: TRADE SECRET SECURITY

### I. PURPOSE:

- A. Appleton Papers Inc. (API) maintains special competence in its various fields of endeavor. This provides the source for growth of the organization and is a source for opportunities and security for employees throughout the Company.
- B. The maintenance of this special competence depends to a significant degree on API's possession of trade secret technical and commercial information--information not generally known by persons outside the organization and providing opportunities for advantage over competitors.
- C. This policy defines responsibilities for security of trade secrets.

### II. RESPONSIBILITIES/GENERAL:

All API employees have a common interest and responsibility in seeing that no one accidentally or wrongfully discloses trade secret information to non-API people.

### III. DEFINITIONS:

#### A. Trade secret information.

1. Information, including a formula, pattern, compilation, program, device, marketing plan, customer or supplier list, method, technique, or process, all by way of example and not limiting, to which all of the following apply:
  - a. The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and
  - b. The information is the subject of efforts to maintain its secrecy as to non-API people.
2. Information which an employee has a reasonable basis to believe to be trade secret information or which is treated by API as being trade secret information shall be presumed to be trade secret information.



APPLETON PAPERS INC.

COMPANY POLICY

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1-96-000	2 of 6
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. E. McCreary	

SUBJECT TRADE SECRET SECURITY

IV. FORMS USED & RELATED POLICIES/PROCEDURES:

A. Forms Used

None

B. Related Policies/Procedures

1. CP 1-96-201, Consulting Services.
2. CP 1-96-202, Classified Information.
3. CP 1-96-204, Physical Security.
4. CP 1-96-216, Information Requests - Government.
5. CP 1-96-224, Patent Policy - U. S. & Canada
6. CP 9-94-210, Invention & Secrecy Agreement.
7. SPI 9-94-013, Employee Termination Check-List.
8. FP 1-0001, Patent Policy - U. S. & Canada

V. POLICY:

A. To insure the security of trade secrets, the following plan is established:

1. Physical Security

a. Entry to plant and corporate buildings is restricted and controlled (see CP 1-96-204).

1) Identification Badge System

a) Types

1. Employee photo-permanent.
2. Regular service visitor-permanent.
3. Other visitor-temporary.

b) Enforcement

1. All persons in designated areas of Company buildings must wear an identification badge at all times.
2. Supervisors in charge of designated areas will challenge all persons in the area not wearing approved badges. Security guards will check all persons in Company buildings and challenge those without badges.



APPLETON PAPERS INC.

## COMPANY POLICY

SP-40	DATE
1-36-200	3-4-8
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. E. McDaniel	

SUBJECT: TRADE SECRET SECURITY

### V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

#### 2) Building Security

- a) All office and R&DE areas will be kept locked except during regular business hours. During working hours all unlocked doors will be monitored as defined in b), below.

NOTE: For those areas where safety prohibits locking doors, the doors will be equipped with an alarm which activates when the door is opened.

- b) Entrances to all office, Information Services, and laboratory areas will be monitored at all times during business hours by a receptionist who will check badges of all who enter.

NOTE: As an alternative, each such entrance will be locked at all times. These entrances may be opened by security cards.

- c) All areas of the Company will be periodically reviewed for trade secrets which can be detected by observation.

1. The review will be conducted by managers responsible for each area and will be repeated as warranted.
2. The results of the review will be distributed to the persons directly responsible for the areas involved, to the Plant Manager or his representative, and to any other persons whose duties involve or may be affected by this information.



APPLETON PAPERS INC.

COMPANY POLICY

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1-96-003	4 of 6
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. F. McKinney	

SUBJECT TRADE SECRET SECURITY

V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

3) Non-employee Access

- a) All non-regular visitors must secure a temporary visitor pass from the receptionist in the area to which they wish admission.

A complete log will be maintained in each receptionist area of the names of all visitors who seek admission; the organization whom they represent; and the entrance and exit times of each visitor. Each temporary visitor pass will be collected at the conclusion of the visitor's stay and maintained in a secure place.

- b) All regular visitors who are employees of another company rendering service to API may optionally utilize permanent visitor passes which are issued and maintained by the service company. These permanent visitor passes will each have a clearly visible serial number and the name of the service company for which the visitor works. A log will be maintained by API listing the service companies and the serial numbers of the permanent visitor passes assigned to each.

- c) Visitors not subject to a confidentiality agreement executed by them or their employer:

1. Will be restricted during visits to areas which contain no visible trade secrets,
2. Will be escorted by an employee or retiree tour guide at all times during their visit, and
3. Will be denied access to all laboratory and Information Services areas.



APPLETON PAPERS INC.

## COMPANY POLICY

CP NO	DATE
1-96-202	5-26-82
EFFECTIVE	REVISION
2-4-82	
APPROVED BY	
F. F. McK...	

SUBJECT TRADE SECRET SECURITY

### V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

4. All service companies doing business with API, as a condition of continued service at the time of next renewal, will be required to execute a confidentiality agreement binding their employees to not disclose confidential API information to any third parties. This obligation will cover all service companies including cleaning, security and maintenance.
5. All construction contracts and purchase agreements requiring employees of the vendor to have access to any API trade secrets for the performance of the contract or agreement will have the execution of a confidentiality agreement by the vendor as a prerequisite to acceptance of the contract or agreement by API.
6. All retiree tour guides will be required to execute a confidentiality agreement.

### 2. Limiting Knowledge

Trade secrets will be available to employees only on a "need to know" basis.

### 3. Marking, Handling, and Control of Documents

- a. All newly generated documents will be reviewed for classification under CP 1-96-202 (Classified Information).
- b. Ultimate responsibility for classification, control and security of each document containing trade secrets will be that of the Major Department Head of the area in which the document was generated.



APPLETON PAPERS INC.

## COMPANY POLICY

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EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. E. McKinney	

SUBJECT: TRADE SECRET SECURITY

### V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

- c. Department Managers will prominently mark as "Confidential" all trade secret documents having a high economic value to competitors, if disclosed to them.
- d. Documents containing or referring to trade secrets and prominently marked as "Confidential" per 3.c. will be handled in strict compliance with CP 1-96-202 (Classified Information).
- e. When not in use documents marked "Confidential" will be kept out of observable view and in a secure area.
- f. Files containing "Confidential" documents will be secured when the area in which they are stored is unattended.
- g. Keys to locked files will be kept in a secure area. Merely hiding keys is not permissible.
- h. Marking of documents containing trade secrets, which have a relatively low economic value to competitors if disclosed to them, is discretionary with the major Department Head. Documents containing trade secrets, but not marked "Confidential", however, remain subject to this trade secret security policy.

#### 4. Documents to be Released to Outsiders

- a. Documents prepared for outside release such as advertisements, press releases, technical papers, articles, and speeches are to be screened by the Head of the Department releasing the document and by the Legal Department before release, to ensure that they do not disclose any trade secrets (See CP 1-96-224).
- b. Documents containing trade secrets are to be released only to other companies operating under a confidentiality agreement with API.



APPLETON PAPERS INC.

CP 40	PAGE
1-96-200	7 26
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. E. McKinney	

## COMPANY POLICY

SUBJECT TRADE SECRET SECURITY

### V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

#### 5. Employee Obligations

- a. New salaried employees are to sign an Invention and Secrecy Agreement (see CP 9-94-210).
- b. New employees are to be reminded during orientation of their obligation to preserve trade secrets.
- c. Employees leaving the Company:
  - 1) Are to turn in all confidential material during the exit interview (see SPI 9-94-013).
  - 2) Are to be reminded of continuing obligation not to disclose trade secrets or to use them in the new employment.

NOTE: If the new employer is a competitor, he should be advised of the confidentiality provisions of the employment agreement binding the former employee.

#### 6. Disclosure to Need-to Know Outsiders

##### a. To Vendors or Contractors

- 1) Department Managers will obtain appropriate written confidential disclosure agreements to hold trade secrets in confidence prior to signing of purchase agreements or construction contracts; and
- 2) Shall see to the return of all copies of trade secrets after their purpose has been accomplished.

##### b. Customers

Will have a written confidentiality agreement prior to disclosure.

##### c. Licensees

Will have a confidentiality clause as part of the license agreement.



APPLETON PAPERS INC.

## COMPANY POLICY

CP NO	PAGE
1-96-203	3 of 4
EFFECTIVE	REVISION
2-4-88	
APPROVED BY	
E. E. McKinney	

SUBJECT: TRADE SECRET SECURITY

### V. POLICY:

A. To insure the security of trade secrets, the following plan is established: (Continued)

#### d. Outside Consultants

Will have a written consultancy confidentiality agreement prior to retention of services (See CP 1-96-201).

#### e. Government Agencies

Disclosure must be approved by the Legal Department (See CP 1-96-216).



**NCR****CORPORATE MANAGEMENT POLICY MANUAL**

<b>Policy</b> <b>CONFIDENTIAL INFORMATION DISCLOSURE</b> <b>POLICY</b>		<b>Policy Number</b> 1407	<b>Page</b> 1 of 2
		<b>Issue No</b> 1	<b>Issue Date</b> 10-1-97
<b>Scope</b> Worldwide	<b>Effective Date</b> 11-1-97	<b>Approved By</b>	
		<b>Organization</b> Business Services Division	

**POLICY PERSPECTIVE**

In today's business environment, proprietary information is one of the most valuable assets a company has, often affording competitive advantage in the development, marketing and implementation of business solutions. In that regard, it is vitally important that we understand what information might be appropriate to share with and/or receive from external partners, suppliers, and customers. Information that is generally available in trade publications, product brochures, and annual reports, after they have been released for general consumption, are types of information that can be provided to or received from external sources without concern for the sensitivity of the information. On the other hand, information about technology, business operations, finances, processes development activities and any other information about a company that is not already available from a public source or from NCR's Public Relations Organization should be considered confidential and requires that we take appropriate steps to safeguard that information and also requires that we only disclose or receive such information when it is absolutely essential to the pursuit of business objectives. Further, it is important that we understand how to provide and/or receive such information in a way that avoids the imposition of conditions which might hamper future activities or give rise to liability.

**POLICY**

1. Each business unit or division of the company shall safeguard NCR's confidential information of all types by permitting such information to be disclosed to other parties only in those instances in which it is to the clear advantage of NCR to do so, and then only when such disclosure is protected by an appropriate agreement (see references below). A division or business unit Vice President must sign the disclosure agreement and approve the disclosure of any NCR confidential information prior to its release. A copy of executed agreements should be maintained within the business unit or division to ensure that it is readily available for reference when required.
2. "Due diligence" must be exercised to ensure that we avoid liability and possible restriction of future activities of the company by accepting confidential information from other parties. Only when it is considered essential to furthering the business of NCR should such materials be accepted, and then only when such information is received under NCR's agreement, providing appropriate safeguards and limitations of liability for NCR.

**NCR****CORPORATE MANAGEMENT POLICY MANUAL**

Policy	Policy Number	Page
<b>CONFIDENTIAL INFORMATION DISCLOSURE POLICY</b>	1407	2 of 2

**POLICY STATEMENTS**

1. The receipt of confidential information by NCR from another party carries substantial risks of corporate-wide liability and will only be received under appropriate contractual safeguards executed and approved by the Vice President of a division or business unit or his/her designated representative.
2. Providing NCR confidential information to other parties will occur only after approval by the Vice President of a division or business unit or his/her designated representative.
3. All materials containing NCR confidential information must be prominently marked confidential and must carry an NCR copyright notice prior to release to any other party.
4. In all instances in which NCR provides or receives confidential information to or from another party, the subject matter to which the information relates as well as the specific form in which the information is conveyed shall be set forth in the NCR Non-Disclosure Agreement, CF1 or the NCR Restricted Information Non-Disclosure Agreement, CF2 depending on the sensitivity of the information ( refer to Corporate Management policy 1402, for details and to Forms Book 2d, located on the P drive for copies of these agreements) and signed by both parties prior to providing or receiving such information..
5. Modification of the language in both NCR agreements CF1 and CF2, or the use of a non-disclosure agreement from the other party shall occur only after review and approval by the NCR Law Department.
6. The original of all executed agreements shall be sent to the Systems and Services group of the NCR Law Department for safekeeping and each NCR division or business unit shall establish and maintain policies and procedures for the retention and management of all executed Non-Disclosure and Restricted Non-Disclosure Agreements.

**Reference Policies/Agreements**

CMP Information and Inquiries on Material Corporate Developments, Policy # 110  
 CMP Sharing NCR Financial Information, Policy # 820  
 CMP Publication of Proprietary Technical Information, Policy # 911  
 CMP Protecting Information within NCR, Policy # 1402  
 NCR Non-Disclosure Agreement, IP1.1  
 NCR Restricted Information Non-Disclosure Agreement, IP1.2

**NCR****CORPORATE MANAGEMENT POLICY MANUAL**

Policy <b>PROTECTING INFORMATION WITHIN NCR</b>		Policy No 1402	Page 1 of 3
		Issue No 5	Issue Date 9/1/99
Scope <b>WORLDWIDE</b>	Effective Date 6/28/96	Approved By Vice President and Chief Information Officer Organization Information Technology Services	

This policy should be read in conjunction with:

CMP 110 "Information and Inquiries on Material Corporate Developments"  
CMP 904 "Standards For Business Conduct (Foreign Corrupt Practices Act)"  
CMP 906 "Copyright Policy"  
CMP 1404 "Information Technology Infrastructure Policy"  
CFAP 109 "Irregularities"  
CFAP 111 "Records Retention"  
CFAP 1809 "Internal Accounting Controls - Information Systems"  
NCR Information Protection Practices (IPP)

**POLICY PERSPECTIVE**

Information is an extremely valuable resource that NCR Corporation (NCR) depends upon to conduct business. To compete successfully in today's business environment, a company must have secure, accurate, and reliable information in order to make proper business decisions. NCR will protect its information resources and provide proprietary information to others only when it is in NCR's best interest and when such disclosure is legally permitted. Proprietary information retains value only while it is a secret. Similarly, NCR will take appropriate steps to protect confidential third-party information with which we are entrusted.

**POLICY**

All NCR employees have a responsibility to safeguard information resources commensurate with the sensitivity, nature, and value of that resource.

The Information Security Officer must be contacted immediately when there is reason to believe proprietary information may be or has been intentionally compromised, stolen, lost or otherwise unaccounted for.

**POLICY STATEMENTS**

1. NCR senior management has the obligation to ensure that "due care" is brought to bear on all processes and procedures through the proper confidentiality of sensitive information in NCR's care. The following Organizational Structure is required to help ensure that NCR meets its obligation to exercise due care:
  - A core team of dedicated information protection subject matter experts must reside within NCR Information Technology Services.



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- The IT Services Vice President and Chief Information Officer of NCR has assigned information protection administration and oversight responsibility to the IT Services Global Technology & Infrastructure organization.
  - Within Global Technology and Infrastructure, the Global Information Security Department is responsible for establishing all information security related guidelines, policies, awareness communications, and participating in information security product selection.
  - The department manager of Global Information Security is the Information Security Officer for NCR.
2. Each NCR Business Unit and major location, working with Global Information Security, must appoint an Information Security Coordinator. The Information Security Coordinator must be a local manager or supervisor, but not necessarily a member of IT Services. The Information Security Coordinator is responsible for facilitating the execution of information protection policies, procedures, and practices as established by Global Information Security. The Information Security Coordinator must be empowered by local management to enforce NCR Information Protection Practices. The list of Information Security Coordinators is available on the Information Security web site. The Information Security Coordinators must also communicate their role locally to insure that all employees in the area they support have a quick method of contacting the Information Security Coordinator in case of an information security emergency. Specific details on the coordinator role are available in Information Protection Practice 113, Responsibilities of Information Security Coordinators.
  3. Global Information Security requirements which support the Corporate Management Policy Manual and the NCR information infrastructure are documented in Information Protection Practices (IPP).
  4. Management at each NCR location must evaluate local Disaster Recovery requirements. A comprehensive Disaster Recovery Plan must be in place to ensure all employees can continue their critical business functions. When prudent business judgment dictates, a local Disaster Recovery Team with an appropriate number of local employees must be appointed and empowered to enforce local disaster recovery measures.
  5. Each NCR employee is responsible for reporting any actual or suspected improper use of proprietary information, including unauthorized access to, or modification of, systems or data, to the Global Information Security Officer or the local Information Security Coordinator who will contact the Global Information Security Officer. Each manager and supervisor is required to annually assess the effectiveness of the information security controls and programs within their organization.
  6. For all NCR confidential and proprietary information, there is a NCR employee who is the information trustee. The information trustee is responsible for making and communicating judgments and decisions regarding identification, security classification, distribution, and protection of a given NCR information resource. In the case of a physical document, the



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creator of the document acts in the role of information trustee. In the case of electronically stored data, the originating data trustee (data owner) acts as the information trustee. In the case of third-party information, the appointed business unit representative acts as the information trustee. If there is any doubt about the classification of information, the information trustee should consult with their manager.

7. All information trustees must classify confidential and proprietary information used according to the sensitivity, nature, and value of the information resource, using the designations, which follow. These designations must be applied to the bottom center of every printed page, electronic report, and electronic file. Documents and electronic images that are translated into a native language must also have the classification markings translated into the same language. If the information is permanently bound, apply the marking to the:
  - outside front and back covers,
  - on spine, if possible, and
  - first and last page.

Attachment A, "NCR PROPRIETARY INFORMATION REFERENCE GUIDE", details additional handling guidelines for proprietary information.

**NCR-SENSITIVE** - This designation is used for any information created, acquired, or controlled by NCR which has not been released, published, or otherwise disseminated outside the company. This designation applies to physical documents as well as electronically stored data. Approval to disseminate sensitive information outside the company must be authorized by the information trustee. This designation is applied to information that NCR wants to keep confidential, however if revealed, substantial strategic advantage and/or financial loss would not occur. Sensitive information includes information such as corporate policies, field engineering customer activity, and requests for shipment of goods. The following marking must appear on each document precisely as presented below:

**NCR-SENSITIVE**

Use pursuant to Company instructions

**NCR-CONFIDENTIAL AND PROPRIETARY** - This designation is used for any information created, acquired, or controlled by NCR which has not been publicly released and needs to be kept confidential to avoid substantial loss of strategic advantage and or financial loss. This designation applies to physical documents as well as electronically stored data. Confidential and proprietary information includes various kinds of confidential or private technical, financial, and business information. Approval to disseminate confidential and proprietary information outside the company must be authorized by the information trustee. The following marking must appear on each document precisely as presented below:

**NCR- CONFIDENTIAL AND PROPRIETARY**

Use pursuant to Company instructions



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**NCR- CONFIDENTIAL AND PROPRIETARY (RESTRICTED)** - This designation is used for confidential and proprietary information for which access is restricted to individuals with a specific "need-to-know." Examples include preliminary operating results and overall marketing, product, technological, manufacturing, and financial strategies, personnel-related information, and all third-party information received by NCR for which NCR has signed a confidentiality agreement. Recipients may copy or distribute such a document only when authorized by the trustee. The following marking must appear on each document precisely as presented below:

**NCR- CONFIDENTIAL AND PROPRIETARY (RESTRICTED)**

Solely for authorized persons having a need to know  
pursuant to Company instructions

**NCR- CONFIDENTIAL AND PROPRIETARY (REGISTERED)** - This designation is used for any information that, in the judgment of the owner, must be subject to continuous accountability. Continuous accountability includes controlling the information distribution using a document registration and numbering procedure. NCR- CONFIDENTIAL AND PROPRIETARY (REGISTERED) information may include, but is not limited to the following types of information: new product/service plans, restructuring plans, new venture plans, strategic plans and business plans. Due to the highly sensitive nature of this information it is not stored electronically on hard drives. Electronic copies may be stored on diskettes that are numbered and kept in a locked secure place. The following marking must appear on each document precisely as presented below.

**NCR- CONFIDENTIAL AND PROPRIETARY (REGISTERED)**

Solely for authorized persons having a need to know  
and subject to cover sheet instructions

*Special Circumstance Marking*

**ATTORNEY-CLIENT COMMUNICATION PRIVILEGED & CONFIDENTIAL** - This designation is used for communications involving or facilitating the rendition of professional legal services:

- from the lawyer to the client (an NCR employee or business unit)
- between the client and the client's lawyer or the lawyer's representative (for example, a paralegal or investigator)
- between the lawyer and the lawyer's representative
- by the client or its lawyer to a lawyer representing another in a matter of joint and common interest
- between lawyers representing the same client
- between client representatives (NCR business employees) where the subject matter is strictly limited to the retention or facilitation of the rendition of professional legal services on behalf of the client(s) (a note of caution: this type of client-to-client communication may not be privileged in all jurisdictions)



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Any employee of NCR who is seeking professional legal advice or services (whether from in-house lawyers or outside counsel) in a matter relating to NCR business is the "client" for the purposes of this privilege. Examples of such communications would include written, oral or electronic inquiries to one of NCR's attorneys as to whether the Company may face any legal exposure in a given transaction, as well as the attorney's response.

All such written or electronic communications should be designated confidential by marking "**PRIVILEGED & CONFIDENTIAL/ATTORNEY-CLIENT COMMUNICATION**" in bold in the subject heading of the document and on each page of the document in a header or footer. In an e-mail communication, include the designation "PRIVILEGED & CONFIDENTIAL" in the subject line. Such communications may be disclosed only to other employees who need to know in furtherance of the rendition of the legal services. Under no circumstances may such communications or their contents be disclosed to anyone outside the Company. If you have any questions consult your Law Department attorney.

8. To provide notice of resource intent, a NCR information infrastructure (domain) logon warning notice must be issued at every logon. The following notice should also appear when logging into all NCR computer applications and/or platforms (mainframes, clients and servers):

**Warning Notice**

This system is restricted solely to NCR authorized users for legitimate business purposes only. The actual or attempted unauthorized access, use, or modification of this system is strictly prohibited by NCR. Unauthorized users are subject to Company disciplinary proceedings and/or criminal and civil penalties under state, federal, or other applicable domestic and foreign laws. The use of this system may be monitored and recorded for administrative and security reasons. Anyone accessing this system expressly consents to such monitoring and is advised that if monitoring reveals possible evidence of criminal activity, NCR may provide the evidence of such activity to law enforcement officials. All users must comply with NCR Corporate Instructions regarding the protection of NCR information assets.

The following alternative notice may be used only when space limitations prohibit the use of the above message:

**Warning:** This system is restricted to NCR authorized users for business purposes. Unauthorized access is a violation of the law. This service may be monitored for administrative and security reasons. By proceeding, you consent to this monitoring.

If based outside the United States, the computer system's notice must be modified to accommodate the country's laws.



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9. The use of encryption is subject to national and international legislation. Message encryption should not be used when transmitting messages to countries where data encryption is prohibited by local statutes. Alternate methods should be used to relay NCR proprietary information to those countries. Certain countries require a license to import encryption software and hardware; in all cases, NCR will obtain the appropriate importing license(s). All NCR-Confidential and Proprietary Information transmitted over a non-NCR managed network must be encrypted with Secure Socket Layer (SSL) or an encryption tool agreed upon by NCR and the recipient.
10. Standard agreements have been designed for companies and individuals granted access to NCR proprietary information and the NCR infrastructure. Copies of these forms can be found on the NCR Network Access Methods and Processes Web Site. All NCR managers and supervisors are responsible for assuring that temporary employees (e.g., contractors and agency temporaries) have signed the appropriate agreements. Processes have been established with some select providers that have contractors sign the required forms.
- a) Nondisclosure Agreement - All companies who have access to NCR confidential and proprietary information must sign a Nondisclosure Agreement (NDA). The NDA sets forth the terms and restrictions that will apply to the exchange of information on a confidential basis. Both parties must sign an approved NCR NDA form before NCR provides confidential and proprietary information to another party or receives confidential and proprietary information from another party. Individuals representing companies with signed NDA agreements are also bound by those agreements. Managers and supervisors must not give temporary employees access to third party confidential information unless the agreement governing that information expressly permits such disclosure.
  - b) Network Access Agreement: - All companies who are granted access to the NCR infrastructure must sign a Network Access Agreement (NAA). The NAA provides the terms and restrictions that apply to parties granted access to certain of NCR's internal computer programs, systems and communication networks. Individuals representing those companies are bound by the NAA signed by those companies.
  - c) NCR Electronic Authorization Agreement: - Non-NCR individuals who are granted access to the NCR infrastructure must sign the NCR Electronic Authorization Agreement (NEAT). The NEAT Agreement defines NCR's expectations of non-NCR individuals granted access to the NCR infrastructure.
11. Managers and supervisors must minimize exposure of NCR- CONFIDENTIAL AND PROPRIETARY (RESTRICTED) and NCR- CONFIDENTIAL AND PROPRIETARY (REGISTERED) information to temporary employees, contractors, consultants and other business partners.
12. When an employee or contractor, etc. leaves a Business Unit, the manager or supervisor must recover all confidential and proprietary information assigned to, or in the possession of, that employee or contractor, etc. This includes the revoking of passwords and logon IDs. When an employee who has had access to significant confidential and proprietary information leaves NCR, particularly if he or she may be working for an NCR competitor,





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the manager or supervisor may request the Law Department to conduct an exit interview to remind the employee not to disclose or use confidential and proprietary information acquired during employment. Additionally, the manager or supervisor may request that a letter containing a similar reminder be sent to the employee's new employer.

13. NCR computer resources are to be used in the furtherance of NCR business only. Refer to CMP 1404, Information Technology Infrastructure Policy. Local organizations must implement physical security measures designed to protect information-processing activities from unauthorized viewing, use, modification, or destruction.
14. All NCR-owned Microsoft-based workstations and servers that utilize NCR private network resources must have the NCR approved distribution software, e.g., Microsoft System Management Software (SMS), installed and operational when deployed by NCR. Deviations from the approved distribution software must be submitted in writing and will require the approval of the Vice President of Global Technology and Infrastructure. The exception form entitled "IT Services Distribution Software Exception Request" can be found in the QuickLook "Forms and Templates" file. Workstations and servers approved for exception will not be supported by IT Services. Removal of the NCR approved distribution software from a system without approval of the Vice President of Global Technology and Infrastructure is a direct violation of this policy.
15. All Microsoft-based workstations and servers that utilize NCR private network resources must have the latest release of NCR-approved virus control software installed and operational. This includes NCR business partners who have permission to access NCR's internal network infrastructure and have 'write or delete' permissions to file servers with MicroSoft Office files.
16. All NCR employees, suppliers, contractors, and consultants utilizing NCR's internal from NCR premises or being granted unrestricted remote access to NCR's internal network must utilize the automated procedure started at logon, supplying their user names, passwords, and domains. All NCR production domains, or NCR domains with trusts to NCR production domains, must utilize NCR's standard logon procedures.
17. Access control software available in applications and operating systems must be used at all times. Specific login and password requirements can be found in Information Protection Practice 109, UserID and Password Management.
18. All business critical information (as determined by the local Disaster Recovery Team) should be recoverable through scheduled back-up, off-site storage, and a business recovery plan. The timeliness of recovery should be directly related to the information's importance to business operations.
19. Proper user access controls must be maintained in each organization. NCR-CONFIDENTIAL AND PROPRIETARY (RESTRICTED) and NCR-CONFIDENTIAL AND PROPRIETARY (REGISTERED) information (documents or electronic storage media) must

**NCR****CORPORATE MANAGEMENT POLICY MANUAL**

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be kept in a locked storage area (i.e., a file cabinet or desk drawer), not accessible to any person other than an employee with an authorized need for the information.

20. Business units must have local procedures in place which provide secure methods for the disposal (e.g., shredding) and archiving of proprietary information.
21. Individuals failing to comply with the provisions of this policy are subject to disciplinary action up to and including dismissal. In addition, violations of this policy may result in legal action, including injunctive relief and civil damages, and/or criminal prosecution.
22. Individuals, organizations, or teams failing to comply with the provisions of this policy may be disconnected from the infrastructure LAN.

NCR PROPRIETARY INFORMATION REFERENCE GUIDE					
MARKING +	MARKING APPLICATION ++	PHYSICAL & ADMINISTRATIVE CONTROLS ++	REPRODUCTION ++	DISTRIBUTION ++	DESTRUCTION/ DISPOSAL +++
<b>NCR-SENSITIVE</b> Use pursuant to Company instructions  <b>NCR-CONFIDENTIAL AND PROPRIETARY</b> Use pursuant to Company instructions	Apply to bottom center of each page record, frame, electronic image etc., unless permanently bound. If bound, apply marking to front & back covers & first and last page	Each employee is responsible for usage control while conducting NCR's business	With the permission of the information trustee (owner), employees of contractors who have a signed nondisclosure agreement may make limited copies	Internal Use company envelope whenever possible External Use sealed envelope Electronic copies must be encrypted when transmitted over the public Internet	Render documents unreadable by shredding or by approved recycling program. Shred or erase magnetically recorded documents if not able to recycle
<b>NCR- CONFIDENTIAL AND PROPRIETARY (RESTRICTED)</b> Solely for authorized persons having a need to know pursuant to Company instructions	Same as above	Originator is responsible for ensuring that restricted information is distributed on a need-to-know basis Recipient is responsible for ensuring that restricted information is kept under lock and key when not in use	Limited copies to be made only by originator or his/her designate	Internal distribution requires double sealed envelope. Inside envelope marked proprietary to be opened by addressee only For transmittal to an external location registered or certified mail return receipt requested should be utilized Electronic copies must be encrypted when transmitted	Destruction required. Render unreadable via shredding or erasing magnetically recorded documents
<b>NCR-CONFIDENTIAL AND PROPRIETARY (REGISTERED)</b> Solely for authorized persons having a need to know and subject to cover sheet instructions	Same as above, except that each copy must have a proprietary registered document cover sheet and the document must have the appropriate registration number either stamped, typed or hand printed on each page	Same as above and in addition originator is responsible to number each copy, log distribution, deliver, ensure accountability, and secure all originals, drafts & copies not in use. (See destruction)	Limited copies to be made only by originator or his/her designate	Same as Restricted Electronic copies are restricted to diskettes and must be encrypted at all times. May not be electronically transmitted	Return to originator who then renders unreadable via shredding or shred with originator's approval and certify destruction on the registered proprietary document cover sheet and return cover sheet to originator. Diskettes must be erased using software like Norton Utilities or Secret Agent or physically destroyed

- Absence of a marking does not necessarily imply that the information is not proprietary
- + The originator is responsible for choosing the correct marking, reflecting document value and sensitivity, according to Company instructions
- ++ For information residing in electronic form in computer systems the management, access and usage control responsibilities of the originator (also known as the owner) may be transferred to custodians and/or suppliers or services on a fiduciary basis. However, it is the responsibility of the originator/owner to ensure that proprietary information is classified according to its sensitivity and access afforded on a need to know basis
- +++ Legal and/or regulatory retention requirements may apply. Refer to the NCR CFAP 111 Records Retention, Information Protection Practices and your Department Retention Coordinator for detailed explanation of destruction criteria and procedures

**REMEMBER:** Where there is reason to believe proprietary information may be or has been intentionally compromised, stolen, lost or otherwise unaccounted for, immediately contact the Information Security Officer at 622-1696 or 937-445-1696 or email [information.security@daytonoh.ncr.com](mailto:information.security@daytonoh.ncr.com)

Sales By Appleton Coated Paper Company  
To  
National Cash Register Company

<u>Grade Description</u>	<u>Pounds Sold *</u>	
	<u>1968</u>	<u>1969</u>
CPS	33,681,960	43,706,822
CB	30,194,283	33,914,042
Tag	10,639,379	14,669,591
Ledges	4,118,172	8,104,020
Pre-Collated	2,968,793	4,868,904
Self-Contained	2,356,444	4,670,368
Misc. Other	1,317,766	4,029,918
Thermocopy	<u>120,316</u>	<u>32,676</u>
TOTAL	88,506,319	114,153,234

\* Company records were maintained only for pound information by grade.  
Dollar value by grade for shipments made is not determinable.

KAL000001

Sales By National Cash Register Company

To

Appleton Coated Paper Company

<u>Product Description</u>	<u>1968</u>	<u>1969</u>
Emulsion and Dye	\$8,110,919	\$7,039,517
Forms and Computer Rental	\$ 39,069	\$ 57,732
Base Stock		\$1,284,313*

\* Purchased from Combined Paper Mills which became a subsidiary of

NCR in 1969.

KAL000002

Exhibit 13A

Sales By Appleton Coated Paper Company  
To  
National Cash Register Company

<u>Grade Description</u>	<u>Pounds Sold *</u>	
	<u>1968</u>	<u>1969</u>
CFB	33,801,300	43,706,822
CB	30,141,283	33,014,042
Tag	10,639,379	14,449,591
Lodger	4,118,172	8,104,020
Pre-Collated	2,966,793	4,966,904
Self-Contained	2,339,444	4,070,368
Misc. Other	1,317,766	4,028,910
Thermocopy	<u>170,316</u>	<u>32,478</u>
<b>TOTAL</b>	<b>88,596,319</b>	<b>114,183,318</b>

\* Company records were maintained only for pound information by grade.  
Dollar value by grade for shipments made is not determinable.

KAL000003

## Sales By National Cash Register Company

To

Appleton Coated Paper Company

<u>Product Description</u>	<u>1968</u>	<u>1969</u>
Emulsion and Dye	\$8,110,919	\$7,089,517
Forms and Computer Rental	\$ 39,069	\$ 57,732
Base Stock		\$1,254,313*

\* Purchased from Combined Paper Mills which became a subsidiary of

NCR in 1969.

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NCR

THE NATIONAL CASH REGISTER COMPANY  
DAYTON, OHIO 45409

OFFICE OF  
THE VICE PRESIDENT  
AND GENERAL COUNSEL

September 14, 1970

Department of Justice  
Antitrust Division  
727 New Federal Building  
Cleveland, Ohio 44199

Attention: Mr. Robert S. Zuckerman, Attorney

Re: The National Cash Register Company - Proposed  
Acquisition of Appleton Coated Paper Company ("Appleton")

Gentlemen:

The information below and the documents submitted herewith constitute the second and final installment of NCR's response to your inquiry of July 14, 1970 to Mr. R. Stanley Laing, supplementing NCR's earlier response submitted under date of August 11, 1970.

As in the case of our earlier letter, we have for your ease of reference keyed our responses to the corresponding item numbers employed in your inquiry. However, to assist your understanding of certain portions of the information set forth below a few introductory notes would seem appropriate.

Item 9 as stated in your inquiry relates to the product lines disclosed in response to item 8, and items 10 and 11 are tied to our response to item 9. Our earlier response to item 8 consisted of a reference to the data set forth in item 6 of NCR's July 9, 1970 Special Report to the Federal Trade Commission. Examination of that data discloses a reporting problem inherent in the SIC code system employed in the Bureau of Census Forms from which the data was extracted. The principal dealings between NCR and Appleton have been in NCR's brand of carbonless copy paper (sold by NCR under the trademark "NCR Paper") for which Appleton has acted as one of NCR's production subcontractors. However, NCR's carbonless copy paper business has not been shown under a readily

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September 14, 1970

Attn: Mr. Robert S. Zuckerman, Atty.

identifiable heading or SIC code number on NCR's Bureau of Census reports since carbonless copy paper has never been manufactured by NCR on its own premises. The result has been to lump most of our carbonless copy paper business into the catch-all SIC category (580000), covering goods purchased from others for resale without further processing on our premises, which category also covers, with respect to NCR, a substantial amount of other unrelated business. The only references to product lines related to carbonless copy paper in our response to item 6 of the FTC Special Report (which is a consolidation of NCR and all domestic subsidiaries) are those dealing with SIC code 262139 and a group of numbers prefixed 275 and 276, which latter numbers deal with business forms. The reference to 262139 indicates that NCR first entered that product line in July of 1969. Actually that date reflects NCR's acquisition of Combined Paper Mills, Inc. ("CPM"), another of NCR's production subcontractors, for which 262139 was an existing product code for Bureau of Census purposes.

Some of the carbonless copy paper obtained by NCR from its production subcontractors has been used as a raw material by NCR's Systemedia (formerly Business Forms and Supply) Division in the production of various printed business forms which are marketed directly by NCR to ultimate consumers through NCR's nationwide network of branches. Such paper could be regarded as "used" or "sold" by NCR, but inasmuch as business forms as an end product are substantially different from the carbonless copy paper sold in bulk quantities to paper merchants, distributors and further converters by NCR's Special Products Division, the products are treated separately below even though Appleton is not in the business forms field.

Also not shown in the list of SIC numbers reported under item 6 of the FTC Special Report is the microcapsule emulsion for NCR's brand of carbonless copy paper, which emulsion is manufactured by NCR and "sold" to NCR's production subcontractors for use as one of the coating substances. The absence of that product line is due to NCR's accounting treatment of the emulsion as a consignment item which comes back to NCR on the coated paper and thus is not "sold" in an accounting sense. The records of NCR's production subcontractors, on the other hand, would probably reflect purchases of emulsion from NCR.

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Attn: Mr. Robert S. Zuckerman, Atty.

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September 14, 1970

As stated in our August 11 response, we regard NCR's brand of carbonless copy paper as an NCR product, not as a product of any of NCR's production subcontractors such as Appleton. Thus it is difficult for us to perceive how such paper produced for us by Appleton could be regarded as "competing" with any NCR product. Consequently our response to item 9 ignores the "compete with" element of the item and covers our carbonless copy paper business generally.

We believe that the foregoing explanation was required because without it you would doubtless encounter extreme difficulty in matching the data below with the material previously submitted in response to your item 3, which difficulty in all probability would result in a further request from you for clarification.

\* \* \*

3. (1) NCR's annual domestic sales of (a) bulk carbonless copy paper and (b) business forms incorporating carbonless copy paper during the years 1968 and 1969 were as follows:

	(a) Sales of bulk carbonless copy paper by NCR's <u>Special Products Division</u>	(b) Sales of Business Forms incorporating carbonless copy paper by NCR's <u>Systemedia Division</u>
1968	\$47,225,418 (*)	\$12,900,000 (**)
1969	54,441,737 (*)	16,500,000 (**)

(\*) Do not include intracompany "sales" of carbonless copy paper by Special Products Division to Systemedia Division valued at \$4,170,168 and \$5,245,323 in 1968 and 1969 respectively

(\*\*) Do not include business forms produced by Systemedia Division for internal consumption by NCR, valued at approximately \$1,000,000 in each year.

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Antitrust Division  
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September 14, 1970

(2) Viewing "industry sales" as reflecting only domestic sales of chemical-transfer carbonless copy paper comparable to the type of such paper sold by NCR, it is estimated that NCR's market share is approximately 85%. No estimates are available with respect to other carbonless transfer systems and carbonated transfer systems. As stated below, all of such products appear to enjoy complete market interchangeability. With respect to NCR's annual domestic sales of business forms incorporating carbonless copy paper, it is estimated that NCR's market share is approximately 3.6%.

10. The names and city addresses of the ten largest customers of bulk carbonless copy paper sold by NCR's Special Products Division (exclusive of "sales" to NCR's Systemedia Division) in 1968 and 1969 are as follows:

<u>Customer</u>	<u>1968</u>	<u>1969</u>
Moore Business Forms, Inc. Toronto, Ontario, Canada	\$5,256,000	\$6,770,000
Zellerbach Paper Co. San Francisco, California	5,594,000	6,259,000
Nationwide Papers Inc. Hamilton, Ohio	4,521,000	4,231,000
Chatfield Paper Co. Cincinnati, Ohio	2,093,000	2,313,000
Beeckman Paper Co. New York, New York	1,957,000	1,695,000
Standard Register Co. Dayton, Ohio	1,248,000	1,491,000
Carter, Rice Storrs & Bement Inc. Boston, Massachusetts	1,392,000	1,375,000
Varco Incorporated Barrington, Illinois	1,256,000	1,317,000

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<u>Customer</u>	<u>1963</u>	<u>1968</u>
Reynolds & Reynolds Co. Dayton, Ohio	\$1,143,000	\$1,061,000
Control Data Corporation Lincoln, Nebraska	823,000	749,000

Certain of the cities shown in the foregoing list are the locations of plants or billing points of the companies named which are specified by them in connection with their purchases of carbonless copy paper from NCR. It is anticipated that in some instances the general offices of those companies may be located elsewhere.

NCR's ten largest customers of business forms incorporating carbonless copy paper sold by NCR's Systemedia Division in 1968 and 1969 cannot be determined without an excessive expenditure of time and money. Such forms are marketed locally by NCR's branches (numbering approximately 225 exclusive of sub-offices), which branches perform customer billing and maintain all sales records. No attempt has been made to correlate the nationwide results of such localized marketing into data responsive to this item.

11. NCR's principal competitors with respect to bulk carbonless copy paper comparable to the type of such paper sold by NCR are as follows:

Minnesota Mining and Manufacturing Company  
St. Paul, Minnesota

U. S. Plywood-Champion Papers, Inc.  
New York, New York

Nashua Corporation  
Nashua, New Hampshire

NCR's principal competitors with respect to business forms incorporating carbonless copy paper are as follows:

Moore Business Forms Inc.  
Niagara Falls, New York

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Burroughs Corporation  
Detroit, Michigan

International Business Machines Corporation  
Armonk, New York

Standard Register Company  
Dayton, Ohio

Uarco Incorporated  
Barrington, Illinois

Reynolds & Reynolds Co.  
Dayton, Ohio

Ennis Business Forms  
Ennis, Texas

12. NCR's major suppliers (production subcontractors) of carbonless copy paper, together with the dollar amounts of such paper purchased from each in 1968 and 1969, are shown below. The precise grades of such paper purchased from each during those years, expressed in pounds because of the unavailability of dollar figures, are shown on the accompanying schedule labeled "Exhibit 12". As explained above, most of such paper is resold by NCR's Special Products Division to various paper merchants, distributors and further converters. A portion is used by NCR's Systemedia Division in the production of business forms. As an ultimate end use, carbonless copy paper is used in the production of a wide variety of business forms and papers

	<u>1968</u>	<u>1969</u>
Appleton Coated Paper Company	\$22,420,000	\$32,439,000
Mead Corporation	12,583,000	13,740,000
Nekoosa-Edwards Paper Company	2,643,000	3,129,000
Combined Paper Mills, Inc. *	2,157,000	3,286,000

\*Became a wholly owned subsidiary of NCR on July 31, 1969.

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Antitrust Division  
Attn: Mr. Robert S. Zuckerman, Atty.

September 14, 1970

13. Sales by Appleton to NCR during 1968 and 1969 were as follows:

<u>General Product</u> <u>Description</u>	<u>Dollar Volume:</u> <u>1968</u>	<u>1969</u>
Carbonless copy paper	\$22,420,000	\$32,420,000

Sales by NCR to Appleton during 1968 and 1969 were as follows:

<u>General Product</u> <u>Description</u>	<u>Dollar Volume:</u> <u>1968</u>	<u>1969</u>
Emulsion and Dye	\$ 6,005,213	\$ 7,218,354
Base stock*	2,508,989	1,244,647

It is possible that the local NCR marketing branch covering the territory which includes Appleton, Wisconsin, may have had minor dealings with Appleton in the nature of equipment sales and rentals and supply sales. No attempt has been made to determine the precise volume of such transactions inasmuch as the aggregate of such business is believed to be insignificant.

\* \* \*

15. As stated earlier in one of the introductory paragraphs of our August 11 letter, NCR contemplates the operation of Appleton as a separate subsidiary. No changes in Appleton's business operations as heretofore conducted are anticipated.

16. The basic reason underlying NCR's desire to acquire Appleton is the hope that NCR by so doing will be able to retain some position in an industry which NCR created and pioneered and from which it could find itself excluded in the very near future. Carbonless copy papers were developed by NCR in the 1950's. Motivated in part by a disinclination to invest huge sums of capital in constructing production facilities for an experimental sideline product and more significantly by a total lack of

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\* Represents sales to Appleton by CPM for both full years. CPM did not, however, become a subsidiary of NCR until July 31, 1969.

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Antitrust Division

Attn: Mr. Robert S. Zimmerman, Atty.

knowledge of or experience in the sciences of making and coating paper. NCR elected to subcontract the production of its carbonless copy paper to firms already in the paper industry who possessed some skills in coating technology and at least the beginnings of the manufacturing equipment required. One of the natural consequences of that election, however, has been to give those subcontractors a wealth of experience in the production of carbonless copy paper. When NCR's basic patents commence expiring in 1972, there would be little to prevent those of NCR's subcontractors which are fully integrated paper producers from large investments in coating skills and equipment from severing their existing relationships with NCR and either developing, producing and marketing their own carbonless systems or joining with others desiring to do the same. Thus, NCR could be excluded from the market absent some action to acquire paper production and coating facilities of its own.

As indicated in our response to item 14 set forth in our August 11 letter, NCR's available capital is now and for the foreseeable future will be dedicated to its continuing efforts to penetrate the electronic data processing equipment industry in the face of well-entrenched competition. Most of such equipment is traditionally leased to customers, and such leasing operations create a continuing drain on NCR's liquid resources. For that reason and for the reason that NCR still did not possess practical hands-on experience in the production processes involved in the coating of carbonless copy paper, NCR decided to acquire production skills and facilities, which decision has resulted in the acquisition of CPM in 1969 and the proposed acquisition of Appleton in 1970, both such transactions involving the issuance of NCR stock to avoid cash expenditures.

Of the four subcontractors which have produced NCR's brand of carbonless copy paper, CPM and Appleton would appear to be the least capable of ever ripening into potential entrants into the carbonless copy paper industry through their own efforts. CPM was before its acquisition by NCR in 1969, and still is, a paper manufacturer of insignificant size lacking ownership of or other affiliation with paper merchants or distributors and possessing only rudimentary marketing skills. CPM was and still is the smallest of the four subcontracting firms, and its coating skills and experience have been largely limited to the application of reactant coatings to the face-side of paper used in NCR's multi-ply carbonless system, substantially the least difficult of the various coating

KAL000012

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Antitrust Division  
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operations required. CPM's efforts in coating the back-side of papers with the microcapsule emulsion carrying the dyes which combine to produce an image with the reactant coating on the face-side of the next adjacent sheet in a multi-ply forms sets have for the most part been experimental and not in significant production quantities.

Appleton is a highly specialized paper processor engaged only in the business of coating papers for the particular uses of others. It makes no paper of its own, being dependent upon raw-stock producers for paper to coat. As an intermediate processor, it has never had reason to develop a marketing organization geared to sell its products through paper distributors. It likewise owns no paper merchants or distributors. As a factor in the over-all paper industry, it is also of insignificant size. Appleton's skills and equipment in connection with its role as a subcontractor coating carbonless copy paper for NCR have been largely dedicated to the much more complex coating of the back-side of papers with the microcapsule emulsion. Appleton has for the past several years produced substantially in excess of 50% of NCR's requirements of carbonless papers, and those sales by Appleton to NCR have constituted approximately 70% or more of Appleton's total dollar business volume. Thus, Appleton has tended to become a near captive supplier to NCR, and it would seem that the acquisition of Appleton by NCR would have little effect on competition.

NCR proposes to maintain its existing relationships with its other two subcontractors, Mead Corporation and Nekoosa Edwards (now a part of Great Northern) so long as those firms are willing to continue those relationships. However, both of those firms are large, well-financed fully integrated paper companies with the capacity to manufacture their own pulp and paper, coat paper, and market the finished products through their own captive merchant chains. As such both are capable of producing and marketing their own carbonless systems and must accordingly be regarded as potential independent entrants in the industry. One of them, Mead, has recently expressed an ultimate desire to become an entrant. Planning along such lines by Mead and Nekoosa Edwards might in fact be stimulated by NCR's acquisition of Appleton.

Not mentioned above are other entrants in the carbonless copy paper field which as of this date consist of an additional fully integrated paper company (U. S. Plywood-Champion), an independent paper converter (Nashua Corporation), and an extremely large multi-product corporation

KAL000013



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Antitrust Division  
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with considerable experience in the production and sale of specialty paper products (Minnesota Mining and Manufacturing Company). All are evidently capable of performing their own in-house coating operations for all or a substantial portion of the carbonless copy papers produced by them. 3M has for several years produced a carbonless system through a royalty arrangement with NCR because of NCR's heretofore protected patent position. 3M's activities will doubtless increase upon termination of that arrangement at the time of the 1972 patent expiration. U. S. Plywood-Champion and NCR are presently in litigation over the patent infringement issue, but as stated above NCR's basic patents will commence expiring in 1972, precluding injunctive relief against infringement. Not enough is known about Nashua's system at this time to evaluate the patent issue.

As a result of all of the foregoing, competitive activity in the industry is on the brink of becoming exceedingly intense. NCR's patent-protected position (once occupying 100% of the industry and diluted in 1965 by the entry of 3M) could, without considerable planning for the future, be suddenly reduced to a near 0% position. NCR, of course, has no assurance that it will be able to retain any part of the market in the face of this burgeoning competition despite its present planning.

Referring again to our response to item 14 as set forth in our August 11 letter, carbonless copy papers themselves compete with more traditional and less expensive multi-ply systems employing carbon papers and carbon backings. For virtually all known uses, carbonless and carboned systems are fully interchangeable. Of the two, carbonless systems, as high-priced convenience-oriented products, are believed to enjoy a substantially smaller share of the total market for all such systems. NCR's position in the carbonless copy paper industry must accordingly be viewed in the light of that total market.

\* \* \*

Please accept our apologies for taking so long to put this final response in your hands. It proved to be much more difficult to obtain the information required to respond to items 9 through 13 of your inquiry than we had originally expected.

KAL000014

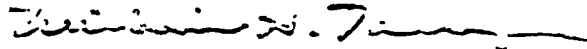
Department of Justice  
Antitrust Division  
Attn: Mr. Robert S. Zuckerman, Atty.

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September 14, 1970

A continued file search for further documents responsive to item 5 of your inquiry has been unproductive, and you may regard our earlier response to that item as being complete. We are accordingly closing our file in connection with this matter and trust that the information set forth above and in our earlier response will similarly permit you to conclude your inquiry.

Very truly yours,



William H. Talmage  
Assistant General Counsel

WHT:mr

Enclosure

KAL000015

(1)

Mr. W. H. Lalmage  
Assistant General Counsel.

Re: Appleton Coated Paper Company

This is in reply to your letter of July 21, 1970 concerning the request for information from the Department of Justice relative to the proposed acquisition of Appleton Coated Paper Company.

8.- A list of the general product lines manufactured and sold by National Cash Register and each of its divisions and subsidiaries including, but not limited to, Combined Paper Mills (alcohol, if possible, the 7-digit Bureau of Census product code for each such product line).

This item has been answered as a result of the report we furnished in reply to the questionnaire from the Federal Trade Commission and as per your memo stating same.

(-)

9. - For each of the product lines shown in Item 8 which compete with or use any product of the type manufactured and/or sold by Appleton Coated Paper please give (1) the dollar volume of sales made by your company and its divisions and subsidiaries in 1968 and 1969; and (2) the estimated percentage share of industry sales possessed by your company and its divisions and subsidiaries.

Product Code 264119 - Printing paper coated at other than where the paper was produced.

This product code would include NCR Paper which is produced by Appleton Coated Paper for the Special Products division. Special Product Division annual domestic sales of NCR paper to customers and to the Systemed division are as shown below. The dollar amount for customers and Systemed division are at sales value and are comparable.

	Customers	Systematic Division
1968	\$47,225,000	\$4,120,000
1969	54,442,000	*5,245,000

Product Code 264952 - Other converted paper and board products (Business Machine supplies, laminated and tiled wallboard, unprinted tags, dispenser, shelf paper, etc., except patterns).

Systematic Division sales of business machine supplies which are included in the product code as reported to the Bureau of Census on Form MA-100 - Annual Survey of Manufacturers are as follows for the years 1968 and 1969

1968

1969

Included in the above amounts are business forms which use REC paper. The sales value of these forms are \$6,500,000 and \$2,100,000, for 1968 and 1969, respectively.

KAL000018

NCR's share of the total market for business forms reported on this product code is estimated to be approximately 3.6%.

We would also like to direct your attention to NCR's reporting of NCR paper on form MA-100. Two conditions are rather important.

- 1) since NCR manufactures emulsion which is shipped and sold to the paper mills for coating paper which is then sold to NCR. The sale of this emulsion is not accounted for as a sale since it becomes a part of the paper cost; 2) the NCR paper was reported as an item purchased for resale without further fabrication since it is coated by the mills and shipped direct to customers.

KAL000019

10. - The names and city addresses of the ten largest customers for each product or product line listed in response to Item 9 for your company and its divisions and subsidiaries in 1968 and 1969, together with the products and dollar amount sold to each.

Product Code 264952 -

(next page)

Product Code 264952 -

Information as to our ten largest customers for this product line is not readily available. The products included in the product line are manufactured by Lexington division, however the domestic branches service the customers for both direct shipments and branch sales.

The accounts receivable records are also maintained by the branches, the task of surveying approximately 220 branches to ascertain the ten largest customers would be quite an undertaking and costly.

KAL000020

\* \*

Product Code 264952	1968	1969
Moore Business Forms Toronto, Ontario Canada	\$ 5,256.000	\$ 6,770.000
Zellerbach Paper Co. San Francisco, California	5,594.000	6,259.000
Nationwide Papers, Inc. Hamilton, Ohio	4,521.000	4,231.000
Chatfield Paper Co. Cincinnati, Ohio	2,093.000	2,313.000
Berkman Paper Co. New York, N. Y.	1,952.000	1,695.000
Standard Register Co. Dayton, Ohio	1,248.000	1,451.000
Butler, Rice Stores & Bement Inc. Boston, Mass.	1,392.000	1,375.000
Acers, Inc. Barrington, Illinois	1,256.000	1,317.000
Reynolds & Reynolds Co. Dayton, Ohio	1,143.000	1,061.000
Central State Corporation Lincoln, Nebraska	823.000	748.000



11- The names, city addresses of the principal competitors of your company and each of its divisions and subsidiaries in each of the products or product lines listed in response to Item 9.

Product Code 264952 -

More Business Forms - Magna Falls, New York

Bussongha Corporation - Rochester, New York

I.B.M. Records - New York

Standard Register Company - Dayton, Ohio

Wesco - Roseington, Virginia

Reynolds and Reynolds - Dayton, Ohio

Ernie's Business Forms - Erie, Pennsylvania

Product Code 264119 -

Minnesota Mining & Manufacturing -

Champion Paper Co.

Washua

12 - A list of your company's five major suppliers of the type of paper manufactured by Appleton Coated Paper and the uses for said paper products, together with the products and dollar amount purchased from each supplier in 1968 and 1969.

Product Code 264719 -

	1968	1969
Appleton Coated Paper	\$22,420.000	\$32,439,000
Inead Corporation	12,583.000	13,748,000
Inkrossa - Edwards	2,643,000	3,129,000
Combined Paper Mills	2,152,000	3,286,000

The Company does not maintain records of purchases from the above companies by product and by dollar value; however we do have the information in pounds as per Schedule F attached.

KAL000023

13 - Show all sales of products by Appleton Coated Paper Company to National Cash Register and sales by National Cash Register to Appleton Coated Paper, including the items sold and the dollar volume of such sales and general description for 1968 and 1969.

<u>Product description</u>	<u>1968</u>	<u>1969</u>
Emulsion and dye	\$ 5,932,218	\$ 7,209,054
	+ 23,000	7,000
@ 7. VCR Paper	2,508,989	1,244,641

KAL000024



THE NATIONAL CASH REGISTER COMPANY • DAYTON, OHIO 45409  
DATA PROCESSING • ACCOUNTING MACHINES • CASH REGISTERS • ADDING MACHINES • SERVICE • SUPPLIES

INTERDEPARTMENT CORRESPONDENCE

OFFICE OF  
CONTROLLER

September 17, 1970

Mr. W. H. Talmage  
Assistant General Counsel

Re: Appleton Coated Paper Company

This is in reply to your letter of July 21, 1970 concerning the request for information from the Department of Justice relative to the proposed acquisition of Appleton Coated Paper Company.

- "8. A list of the general product lines manufactured and sold by National Cash Register and each of its divisions and subsidiaries including, but not limited to, Combined Paper Mills (also list, if possible, the 7-digit Bureau of Census product code for each such product line)."

This item has been answered as a result of the report we furnished in reply to the questionnaire from the Federal Trade Commission and as per your memo stating same.

- "9. For each of the product lines shown in Item 8 which compete with or use any product of the type manufactured and/or sold by Appleton Coated Paper, please give (1) the dollar volume of sales made by your company and its divisions and subsidiaries in 1968 and 1969, and (2) the estimated percentage share of industry sales possessed by your company and its divisions and subsidiaries."

Product Code 264119 - Printing paper coated at other than where the paper was produced.

This product code would include NCR Paper which is produced by Appleton Coated Paper Company for the Special Products Division. Special Products Division's annual domestic sales of NCR Paper to customers and to the Systemedia Division are as shown below. The dollar amounts for customers and Systemedia Division are at sales value and are comparable.

KAL000025

Mr. W. H. Talmage  
September 17, 1970  
Page TWO

	<u>Customers</u>	<u>Systemedia Division</u>
1968	\$47,225,000	\$4,170,000
1969	54,442,000	5,245,000

Product Code 264952 - Other converted paper and board products  
(business machine supplies, laminated and tiled wallboard, unprinted tags,  
draperies, shelf paper, etc., except patterns.)

Systemedia Division sales of business machine supplies which  
are included in this product code as reported to the Bureau of Census on  
Form MA-100 - Annual Survey of Manufactures are as follows for the years  
1968 and 1969.

1968	\$27,144,000
1969	13,246,000

NCR's share of the total market for business forms reported in  
this product code is estimated to be approximately 3.6%.

We would also like to direct your attention to NCR's reporting  
of NCR Paper on form MA-100. Two conditions are rather important: (1)  
NCR manufactures emulsion which is shipped and sold to the paper mills  
for coating paper which is then sold to NCR. The sale of this emulsion  
is not reported as a sale by NCR since it becomes a part of the paper  
cost. (2) The NCR Paper was reported as an item purchased for resale  
without further fabrications since it is coated by the mills and shipped  
directly to customers.

"10. The names and city addresses of the ten largest customers  
for each product or product line listed in response to  
Item 9 for your company and its divisions and subsidiaries  
in 1968 and 1969, together with the products and dollar  
amount sold to each."

Product Code 264119

	<u>1968</u>	<u>1969</u>
Moore Business Forms		
Toronto, Ontario, Canada	\$5,256,000	\$6,770,000
Zellerbach Paper Co.		
San Francisco, California	5,594,000	6,259,000
Nationwide Papers, Inc.		
Hamilton, Ohio	4,521,000	4,231,000

KAL000026

Mr. W. H. Talmage  
September 17, 1970  
Page THREE

<u>Product Code 264119 (Cont'd)</u>	<u>1968</u>	<u>1969</u>
Chatfield Paper Co. Cincinnati, Ohio	\$2,093,000	\$2,313,000
Beekman Paper Co. New York, N. Y.	1,957,000	1,695,000
Standard Register Co. Dayton, Ohio	1,248,000	1,491,000
Carter, Rice Stores & Bement Inc. Boston, Mass.	1,392,000	1,375,000
Uarco, Inc. Barrington, Illinois	1,256,000	1,317,000
Reynolds and Reynolds Co. Dayton, Ohio	1,143,000	1,061,000
Control Data Corporation Lincoln, Nebraska	823,000	749,000

Product Code 264952 - Information as to our ten largest customers for this product line is not readily available. The products included in this product line are manufactured by Systemedia Division; however, the domestic branches invoice the customers for both direct shipments and branch sales. The accounts receivable records are also maintained by the branches, thus, the task of surveying approximately 220 branches to ascertain the ten largest customers would be quite an undertaking and extremely costly.

"11. The names and city addresses of the principal competitors of your company and each of its divisions and subsidiaries in each of the products or product lines listed in response to Item 9."

Product Code 264952

Moore Business Forms - Niagara Falls, New York  
Burroughs Corporation - Rochester, New York  
IBM - Armonk, New York  
Standard Register Company - Dayton, Ohio  
Uarco - Barrington, Illinois  
Reynolds and Reynolds - Dayton, Ohio  
Ennis Business Forms - Ennis, Texas

KAL000027

Mr. W. H. Talmage  
September 17, 1970  
Page FOUR

Product Code 264119

Minnesota, Mining and Manufacturing - St. Paul, Minn.  
Champion Paper Co. - Hamilton, Ohio  
Nashua - St. Nashua, N. H.

"12" A list of your company's five major suppliers of the type of paper manufactured by Appleton Coated Paper and the uses for such paper products, together with the products and dollar amount purchased from each supplier in 1968 and 1969."

Product Code 264119

	<u>1968</u>	<u>1969</u>
Appleton Coated Paper	\$22,420,000	\$32,439,000
Mead Corporation	12,583,000	13,748,000
Nekoosa -Edwards	2,643,000	3,129,000
Combined Paper Mills	2,157,000	3,286,000

The Company does not maintain records of purchases from the above companies by product and by dollar value; however, we do have the information in pounds as per Schedule I attached.

"13. Show all sales of products by Appleton Coated Paper Company to National Cash Register and sales by National Cash Register to Appleton Coated Paper, including the items sold and the dollar volume of such sales and general description for 1968 and 1969."

<u>Product Description</u>	<u>1968</u>	<u>1969</u>
Emulsion	\$5,932,218	\$7,209,054
CF NCR Paper	2,508,989	1,244,647
Bips and CVL Dye	73,425	6,625

In addition, there may be local branch sales and/or equipment rental to Appleton. Records for sales or rental of this nature are maintained primarily by order number and the value would not necessarily be significant; therefore, no value is reported.



R. E. Robbins  
ASSISTANT CONTROLLER

RER/keb  
Attachment

cc: Mr. A. L. Alonzo  
Mr. C. Reams

KAL000028

SCHEDULE I

Purchased in Pounds

	<u>1968</u>	<u>1969</u>
A. Appleton		
15# CB	24,669,370#	26,466,310#
20# CB	3,922,540	3,779,860
26# CB	3,354,670	2,477,220
30# CB	799,270	991,630
13# CB Translucent	43,160	16,690
24# CB Release	5,500	-
22# CB - 25% Rag	42,780	38,490
26# CB Multilith Master	10,480	9,060
12.4# CFB	90,900	429,610
13.6# CFB	106,000	-
17# CFB	35,078,120	40,067,780
15# CF	2,321,140	2,722,720
20# CF	838,940	2,096,380
22# CF Barrier	500	5,000
CF - Blotter	99,800	143,640
14# Self Contained	2,886,840	4,576,430
17# Self Contained	7,000	44,600
35# CF C1S	2,580,470	4,133,800
38# CF C2S	1,457,290	1,735,260
34# CF C2S	123,170	120,640
38# CB C2S	1,110	11,580
Thermocopy	34,800	-
Tag CF	11,046,510	13,385,060
31# CF C1S	-	10,000
24# CB Glassine	-	5,000
Spec. Mohawk Led. CF	-	44,000
Total	89,520,360#	103,310,760#

B. Mead

15# CB	14,194,570	15,591,590
20# CB	1,865,660	1,846,460
22# CB	45,000	45,000
26# CB	1,276,960	1,713,140
30# CB	5,000	-
26# CB Safety	454,070	560,130
15# CFB	452,520	716,600
17# CFB	17,308,130	14,787,350
28# CFB	193,550	231,220
33# CFB	1,230	-
13# CF	33,500	-

KAL000029



SCHEDULE I  
Page TWO

B. Mead (Cont'd)

	<u>1968</u>	<u>1969</u>
15# CF	5,161,950#	2,845,980#
20# CF	1,771,660	169,810
26# CF	15,600	10,000
27# CF C1S	43,040	10,000
31# CF C1S	5,000	-
35# CF C1S	2,630,190	1,358,430
30# CF C2S	71,200	60,900
34# CF C2S	67,170	15,850
38# CF C2S	896,550	673,340
Tag CF	1,804,500	137,380
Tab CF	14,000	118,960
24# CB	-	15,000
27# CF	-	41,850
Total	48,311,050#	40,948,990#

C. Nekoosa

15# CF	15,586,490	15,262,780
20# CF	-	359,770
Total	15,586,490#	15,622,550#

D. Combined

15# CF	14,414,980#	32,222,580#
Total Pounds	167,832,880#	192,104,880#

KAL000030







# GRADE DISTRIBUTION AT APPLETON

MILLIONS OF POUNDS

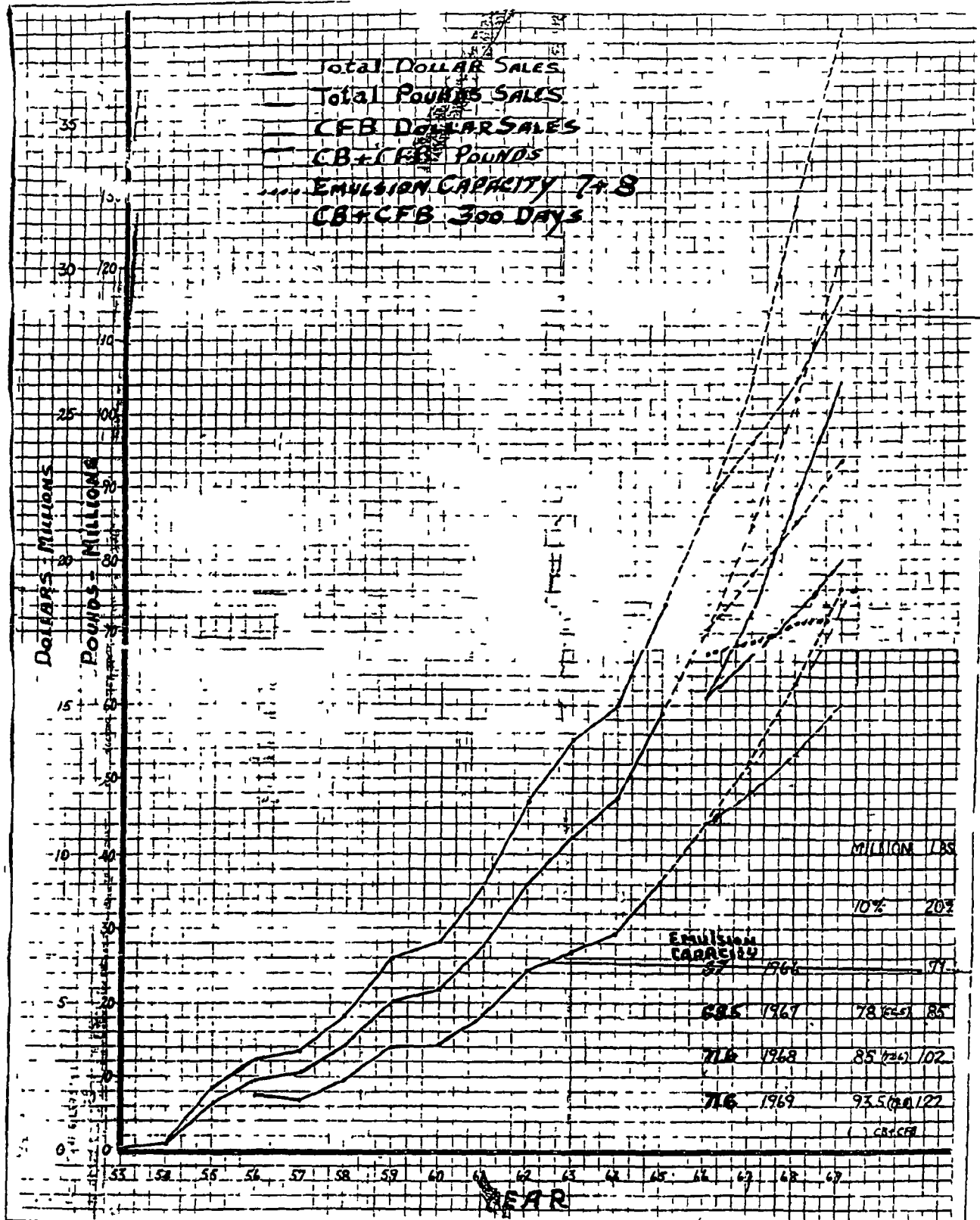
<u>Yr.</u>	<u>REG WT. CFB</u>	<u>Lt. WT. CFB</u>	<u>SELF CONT.</u>	<u>SLD CB</u>	<u>CF GRADE</u>	<u>Misc.</u>	<u>TOTAL</u>
60	10.1			8.8	2.8	0.2	21.9
1	12.7			11.1	3.9	0.1	27.8
2	16.9			14.3	4.8	0.1	36.1
3	19.0	0.2		16.9	6.2	0.2	42.5
4	21.6			17.5	7.8	0.5	47.4
5	25.6			22.7	9.0	0.6	57.9
6	30.0			25.9	11.6	0.7	68.2
7	31.1			28.4	12.4	1.0	72.9
8	33.8	1.0	3.0	30.8	14.2	0.3	83.1
9							90.0
70							98.0
1							
2							

MACHINE PLANNING FOR OPTIMUM GAIN  
TO NGR AND APCO REQUIRES  
FIRM ESTIMATE OF:

- A. TOTAL TONNAGE
- B. GRADE DISTRIBUTION

GFB (REG. + Lt. WT.)  
CB  
SC  
CF GRADES.





KAL000035

# MANUFACTURING STATISTICS

	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986
Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.	Q. AVE. MO. AVE.
TOTAL PRODUCTION (M FS)											
CONC.	67	74	120	77	60	101	112	114	124	141	2,001
Rods											678
Secunde											174
COMMERCIAL TOTAL	3,665	3,211	3,209	2,848	3,779	3,800	3,902	3,242	3,327	3,300	3,628
NGR	4,417	3,794	3,861	4,186	5,110	5,046	2,871	2,467	2,766	1,976	-1,665
Sheds	16,864	11,191	10,100	7,471	9,632	8,169	6,700	6,622	6,670	6,823	-4,278
Rods											
Pie-Constructed											
NGR TOTAL	19,771	14,926	13,944	11,607	14,648	11,835	9,671	8,500	9,484	7,809	6,441
NONIMPACT											516
ELECTRIC											
NON-PAPER											
REWORK	23,334	18,156	18,243	14,263	18,427	18,414	12,800	12,241	12,761	11,169	9,306
TOTAL PERFECTS & REWORK	23,401	18,210	18,373	14,330	18,517	18,447	12,902	12,366	12,868	11,300	9,409
TOTAL PERF. REW. ASEQ.	2,979	2,048	1,761	1,933	2,311	1,691	1,631	1,427	1,631	1,340	1,181
WASTE	28,300	30,260	18,624	18,263	20,728	17,348	14,623	13,702	14,418	12,848	10,720
MILL TOTAL											11,104
YIELD	90.40%	90.63%	97.74%	97.46%	98.80%	98.04%	98.00%	98.83%	98.67%	98.25%	97.88%
PERFECTS %	0.28%	0.37%	0.86%	0.47%	0.43%	0.60%	0.77%	0.83%	0.60%	1.11%	1.62%
SECONDS %	11.30%	10.11%	11.61%	12.06%	10.67%	10.30%	10.64%	10.86%	10.62%	10.66%	10.83%
WASTE %											

# MANUFACTURING STATISTICS

	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987
	MO. AVE.	YTD	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.	MO. AVE.
TOTAL PRODUCTION (47 PS)																	
CODE	1,710	20,822,856	1,918	2,160	2,528	2,872	2,711	2,769	3,432	3,053	2,243	2,814	2,814	2,814	2,814	2,814	2,814
Shells	603	6,690,616	677	601	648	769	1,076	666	1,072	1,000	1,210	1,412	1,412	1,412	1,412	1,412	1,412
Secura	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
COMMERCIAL TOTAL	1,290	27,613,118	2,496	2,767	2,596	2,378	2,850	2,850	4,504	4,196	3,424	4,104	4,104	4,104	4,104	4,104	4,104
INDR	18,761	100,012,661	2,496	2,767	2,596	2,378	2,850	2,850	4,504	4,196	3,424	4,104	4,104	4,104	4,104	4,104	4,104
Shells	603	6,690,616	677	601	648	769	1,076	666	1,072	1,000	1,210	1,412	1,412	1,412	1,412	1,412	1,412
Secura	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pre-Combined	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
INDR TOTAL	21,629	269,641,779	2,496	2,767	2,596	2,378	2,850	2,850	4,504	4,196	3,424	4,104	4,104	4,104	4,104	4,104	4,104
INDR IMPACT	4,216	74,827,162	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216	4,216
ELECTRIC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NONPAPER	40	419,120	19	48	48	60	41	60	66	34	173	173	173	173	173	173	173
REWORK	100	2,354,000	176	377	343	501	283	173	276	22,568	20,280	23,007	23,007	23,007	23,007	23,007	23,007
TOTAL PERFECTS & REWORK	30,397	300,407,137	28,700	27,603	26,009	24,001	27,003	26,003	23,001	22,568	20,280	23,007	23,007	23,007	23,007	23,007	23,007
TOTAL PERF. REW. 15EQ	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WASTE	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114	4,114
MILL TOTAL	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698	34,698
YIELD																	
PERFECTS %	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%	88.74%
SECONDS %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
WASTE %	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%	11.76%

KAL000037



APPLETON COATED PAPER

1969 PROFITABILITY

J. E. Grabow

KAL000038

THE APPLETON COATED PAPER COMPANY  
1969 PROFITABILITY  
NCR CLASSIFICATION

1970 Budgeted Tonnage in M Lbs.

GRADE DESCRIPTION	SALES IN POUNDS		PERCENT CHANGE	YIELD		CWT. NET MANUFACTURING COST		CWT. AVERAGE SELLING PRICE	
	1968	1969		1968	1969	1968	1969	1968	1969
NCR Thermocopy Paper	105,075	7,839	(92.5)%	67.9%	39.2%	\$157.45	\$288.83	\$176.42	\$176.83
1970 Budgeted Data		--		--	--		--		--
NCR Thermal Paper	15,441	24,837	60.9	71.6	--	131.87	--	151.04	--
1970 Budgeted Data		300			90.0		34.05		45.75
Total Thermocopy	120,516	32,676	(72.9)%	68.4%	39.2%	\$154.32	\$288.83	\$173.32	\$176.83
CB 33# Sheets	4,009,942	4,894,763	22.1%	90.3%	90.3%	\$ 29.89	\$ 29.89	\$ 36.41	\$ 36.74
1970 Budgeted Data		4,659			90.6		31.16		38.02
CB 46# Sheets	1,469,059	2,117,036	44.1	91.3	90.5	25.07	25.17	32.02	32.74
1970 Budgeted Data		2,098			91.0		25.16		33.65
CB 61# Sheets	788,740	839,356	6.4	89.8	90.5	23.28	23.17	28.65	29.31
1970 Budgeted Data		844			88.5		24.07		29.95
Total CB Sheets	6,267,741	7,831,155	25.3%	90.5%	90.4%	\$ 27.69	\$ 27.78	\$ 34.51	\$ 34.75
CB 33# Rolls	19,308,080	21,999,416	13.9%	96.4%	96.4%	\$ 26.55	\$ 26.33	\$ 30.37	\$ 31.00
1970 Budgeted Data		16,820			96.8		27.54		31.68
CB 46# Rolls	2,167,888	2,028,142	(6.4)	96.4	96.4	23.41	23.45	28.10	28.75
1970 Budgeted Data		1,580			96.5		23.62		29.66
CB 61# Rolls	2,450,574	2,035,329	(16.9)	96.2	95.9	22.31	22.51	26.91	27.50
1970 Budgeted Data		1,600			96.5		21.62		28.25
Total CB Rolls	23,926,542	26,062,887	8.9%	96.4%	96.3%	\$ 25.82	\$ 25.82	\$ 29.79	\$ 30.56
Emul. 25% Rag Bond Sheets	38,817	42,763	10.2%	84.9%	83.0%	\$ 44.19	\$ 44.40	\$ 52.35	\$ 53.60
1970 Budgeted Data		--			--		--		--
Emul. 25% Rag Bond Rolls	8,916	--	(100.0)	96.5	--	38.63	--	50.90	--
1970 Budgeted Data		--			--		--		--
Total Emul. 25% Rag Bond	42,733	42,763	.1%	87.5%	83.0%	\$ 42.83	\$ 44.40	\$ 52.05	\$ 53.60
Pre-Collated Sheets	2,966,793	4,966,904	67.4%	84.2%	84.2%	\$ 30.99	\$ 31.71	\$ 37.03	\$ 36.63
1970 Budgeted Data		8,100			85.0		32.69		37.16
Total Pre-Collated	2,966,793	4,966,904	67.4%	84.2%	84.2%	\$ 30.99	\$ 31.71	\$ 37.03	\$ 36.63

KAL000039

THE APPLETON COATED PAPER COMPANY  
1969 PROFITABILITY  
NCR CLASSIFICATION

1970 Budgeted Sales in M Lbs.

GRADE DESCRIPTION	SALES IN POUNDS		PERCENT CHANGE	YIELD		CWT. NET MANUFACTURING COST		CWT.	AVERAGE
	1968	1969		1968	1969	1968	1969	SELLING 1968	PRICE 1969
CFB White Sheets	2,862,360	3,654,563	27.7%	87.0%	88.6%	\$31.48	\$29.85	\$38.85	\$38.22
1970 Budgeted Data		4,331			88.5		30.99		39.07
CFB Canary Sheets	1,779,828	2,480,217	39.4	88.5	89.7	31.89	30.83	40.14	39.02
1970 Budgeted Data		2,867			89.0		31.87		40.13
CFB Pink Sheets	1,430,277	1,921,346	34.3	89.3	87.1	31.77	31.76	40.21	39.76
1970 Budgeted Data		2,074			88.0		32.16		40.15
CFB Green Sheets	656,662	970,684	47.8	89.7	88.0	32.65	32.64	40.33	40.42
1970 Budgeted Data		1,208			89.5		31.91		40.06
CFB Goldenrod Sheets	340,925	449,245	31.8	87.3	91.0	33.72	31.34	40.57	38.88
1970 Budgeted Data		537			88.5		32.98		40.24
CFB Blue Sheets	765,540	958,597	25.2	87.6	88.5	33.40	32.62	40.41	40.57
1970 Budgeted Data		1,834			88.0		32.41		40.15
Total CFB Sheets	7,835,592	10,434,652	33.2%	88.0%	88.7	\$32.00	\$30.97	\$39.72	\$39.10
CFB White Rolls	12,231,272	15,715,101	28.5%	96.4%	95.5%	\$26.84	\$26.27	\$32.59	\$32.50
1970 Budgeted Data		13,586			96.5		27.49		32.57
CFB Canary Rolls	5,961,884	7,579,427	27.1	97.0	95.4	27.66	27.81	33.62	33.50
1970 Budgeted Data		6,486			97.5		28.11		33.79
CFB Pink Rolls	3,523,161	4,106,163	16.5	96.7	94.8	27.93	27.71	33.60	33.50
1970 Budgeted Data		3,367			96.0		28.44		34.01
CFB Green Rolls	1,353,481	2,152,540	59.0	96.8	96.3	29.15	28.27	33.85	34.50
1970 Budgeted Data		1,656			97.0		28.68		34.12
CFB Goldenrod Rolls	1,147,773	1,522,888	32.7	96.0	96.4	29.68	28.73	33.85	34.50
1970 Budgeted Data		1,241			97.0		29.75		34.16
CFB Blue Rolls	1,607,781	1,755,024	9.2	97.0	95.6	29.22	29.00	33.85	34.50
1970 Budgeted Data		1,490			97.0		28.66		34.09
Total CFB Rolls	25,825,352	32,831,143	27.1	96.6%	95.5%	\$27.55	\$27.20	\$33.15	\$33.19
Light Weight CFB Sheets	2,944	11,916	304.8	---	---	---	---	---	---
1970 Budgeted Data		---			---		---		---
Light Weight CFB Rolls	218,078	489,111	124.3	84.8%	90.2%	\$44.19	\$38.19	\$47.46	\$53.03
1970 Budgeted Data		4,100			90.0		37.29		50.00
Total Light Weight CFB	221,022	501,027	126.7%	84.8%	90.2%	44.19	\$38.19	\$47.46	\$53.03
Self Contained Sheets	23,121	162,070	601.0%	82.5%	88.3%	\$36.51	\$32.60	\$39.11	\$43.17
1970 Budgeted Data		1,000			86.0		36.41		49.27
Self Contained Rolls	2,333,323	4,058,295	93.2	86.2	91.3	33.19	30.71	38.74	41.32
1970 Budgeted Data		6,199			93.5		32.39		42.94
Total Self Contained	2,356,444	4,670,365	98.2%	86.1%	90.7%	\$33.22	\$31.07	\$38.75	\$41.67

KAL000040

THE APPLETON COATED PAPER COMPANY

1969 PROFITABILITY  
NCR CLASSIFICATION

1970 Budgeted Sales in M Lbs.		SALES IN POUNDS		PERCENT CHANGE	YIELD		CWT. NET MANUFACTURING COST		CWT. AVERAGE SELLING PRICE	
DE O.	GRADE DESCRIPTION	1968	1969		1968	1969	1968	1969	1968	1969
0	C1S Ledger 35# (Lam.) Shts.	70,353	131,105	86.4%	63.7%	66.1%	\$29.55	\$27.62	\$30.59	\$31.05
	1970 Budgeted Data		154			94.0		28.51		32.34
	C1S Ledger 35# (Lam.) Rolls	5,091	30,606	501.2	--	--	--	--	--	--
	1970 Budgeted Data		--			--		--		--
1	C1S Ledger 35# Sheets	845,772	1,312,967	55.2	87.5	90.4	18.83	18.40	22.05	22.37
	1970 Budgeted Data		1,704			87.5		20.03		24.17
	C1S Ledger 35# Rolls	1,279,574	3,378,357	164.0	94.1	94.2	16.78	17.46	19.75	17.46
	1970 Budgeted Data		4,849			93.5		17.60		21.26
3	C1S Ledger CB 30# Shts.	448,670	562,561	25.4	90.2	91.7	22.35	22.02	29.02	29.82
	1970 Budgeted Data		744			91.5		23.50		30.79
	C1S Ledger CB 30# Rolls	280,218	479,642	71.2	93.9	93.3	21.97	22.36	27.35	28.00
	1970 Budgeted Data		605			95.0		23.79		29.88
4	C2S Ledger 34# Sheets	109,104	111,061	1.8	72.1	82.8	25.80	22.08	24.11	24.78
	1970 Budgeted Data		130			85.0		21.76		25.39
	C2S Ledger 34# Rolls	6,581	42,430	544.7	--	88.1	--	20.01	--	22.00
	1970 Budgeted Data		37			--		19.85		22.50
5	C2S Ledger 38# Sheets	1,025,019	1,558,575	52.1	80.9	86.4	21.53	20.44	24.23	24.49
	1970 Budgeted Data		2,370			87.3		21.56		25.84
	C2S Ledger 38# Rolls	47,790	496,713	939.4	86.8	90.0	18.71	20.19	21.49	22.00
	1970 Budgeted Data		609			91.5		18.96		22.86
	Total Ledger	4,118,172	8,104,020	96.8%	86.5%	90.0%	\$20.25	\$19.31	\$23.72	\$23.19
1	Tag Clay C1S 7½ Pt. Shts.	1,219,964	1,678,153	37.6%	89.9%	89.5%	\$14.29	\$14.62	\$17.45	\$17.73
	1970 Budgeted Data		2,055			89.5		15.05		18.27
	Tag Clay C1S 7½ Pt. Rolls	5,213,417	7,962,728	52.2	94.4	94.3	14.27	13.91	15.75	16.15
	1970 Budgeted Data		9,819			95.0		14.47		16.46
	Tag Clay C1S 10 Pt. Shts.	500,553	597,081	19.3	88.5	88.0	14.14	14.55	17.12	17.44
	1970 Budgeted Data		713			90.5		14.53		17.93
	Tag Clay C1S 10 Pt. Rolls	726,654	900,805	24.0	92.3	95.0	14.67	14.28	15.75	16.15
	1970 Budgeted Data		1,162			93.0		15.28		16.36
	Tag Clay C1S 13 Pt. Shts.	2,447	--	(100.0)	--	--	--	--	--	--
	1970 Budgeted Data		--			--		--		--
	Tag Clay C1S 13 Pt. Rolls	228,631	256,718	12.3	91.1	93.0	14.74	13.93	15.25	15.66
	1970 Budgeted Data		328			93.0		14.90		15.63
2	Tag Clay C1S Bleached Shts.	159,748	301,524	88.7	88.3	86.1	14.76	15.85	17.79	18.60
	1970 Budgeted Data		332			89.5		15.93		18.96
	Tag Clay C1S Bleached Rolls	2,475,708	2,932,074	18.4	93.3	93.5	13.28	14.02	16.15	16.97
	1970 Budgeted Data		3,382			93.5		14.18		17.55
3	Tag Emulsion C1S Rolls	18,711	68,032	263.6	89.2	91.1	19.56	19.82	19.84	20.11
	1970 Budgeted Data		104			90.5		17.70		20.24
4	Tag Clay C2S Sheets	13,217	1,134	(15.8)	85.2	77.5	16.29	18.59	18.69	19.16
	1970 Budgeted Data		--			--		--		--
	Tag Clay C2S Rolls	56,914	6,608	(88.4)	--	89.9	--	17.48	--	16.89
	1970 Budgeted Data		15			90.0		18.49		17.40
5	Tag Duplex CF Rolls	23,715	53,942	127.5	91.6	89.6	16.88	17.26	20.74	21.14
	1970 Budgeted Data		89			90.5		16.57		21.65
	Total Tag	10,639,379	14,669,591	37.9%	92.9%	93.2%	\$14.09	\$14.14	\$16.16	\$16.64

KAL000041

THE APPLETON COATED PAPER COMPANY  
1969 PROFITABILITY  
NCR CLASSIFICATION

1970 Budgeted Sales In M Lbs.		SALES IN POUNDS		PERCENT CHANGE	YIELD		CWT. NET MANUFACTURING COST		CWT. AVERAGE SELLING PRICE	
1.	GRADE DESCRIPTION	1968	1969		1968	1969	1968	1969	1968	1969
	CF Coated Barrier Rolls		6,905	100.0%	--	88.3%	\$ --	\$ 24.85	--	\$40.75
	1970 Budgeted Data		--			--		--		--
	CB Coated Glassine Rolls		3,066	100.0	--	53.8	--	123.05	--	84.48
	1970 Budgeted Data		--			--		--		--
	20# CB Sheets	188,862	1,952,845	934.0	78.8	85.3	25.93	22.44	23.84	24.91
	1970 Budgeted Data		--			--		--		--
	20# CF Rolls	119,857	763,351	536.9	84.8	92.3	21.32	19.49	21.61	21.20
	1970 Budgeted Data		--			--		--		--
	CB Translucent Sheets	18,326	12,720	(30.6)	79.9	82.6	45.99	45.27	51.04	56.78
	1970 Budgeted Data		--			--		--		--
	CB Translucent Rolls	16,938	13,903	(17.9)	83.0	84.0	43.34	44.51	44.26	49.25
	1970 Budgeted Data		--			--		--		--
	CB Series 1000 Sheets	1,901	10,340	443.9	--	74.6	--	110.07	--	102.40
	1970 Budgeted Data		--			--		--		--
	CB Series 1000 Rolls	3,851	4,361	13.2	--	80.0	--	98.50	--	94.97
	1970 Budgeted Data		--			--		--		--
	Misc. NCR Grades Sheets	1,022	9,706	849.7	59.8	83.9	38.63	25.73	45.26	46.72
	1970 Budgeted Data		--			--		--		--
	Misc. NCR Grades Rolls	8,249	9,572	16.0	--	--	--	--	--	--
	1970 Budgeted Data		--			--		--		--
	15# CF Sheets	449,602	821,723	82.8	93.6	92.7	25.21	25.21	26.56	26.45
	1970 Budgeted Data		--			--		--		--
	15# CF Rolls	466,425	377,663	(19.0)	100.0	99.9	18.87	18.93	19.88	19.97
	1970 Budgeted Data		--			--		--		--
	Total Other NCR Grades	1,275,033	3,986,155	212.6%	88.5%	88.8%	\$22.89	\$22.79	\$23.56	\$24.82
	Total NCR	<u>85,595,319</u>	<u>114,153,338</u>	<u>33.4%</u>	<u>93.4%</u>	<u>92.8%</u>	<u>\$25.36</u>	<u>\$25.36</u>	<u>\$30.81</u>	<u>\$30.80</u>

b.6

KAL000042

DISTRIBUTION: T Busch P. Graf  
D Russler P. ~~Roseno~~  
L. Swaim F Strela  
P. Menning D. Schumard  
C. Campshure L. Casey  
J. Plach

**KAL000051**

PREPARED BY

DISTRIBUTION: T. Busch P. G.  
D. Russler P. R.  
L. Swain F. St  
P. Menning D. Se  
C. Campshure L. Co  
J. Pl

[illegible]

11150  
1968 Hb. Variations Buchs.

11/10/2011

1967 Series

Guido R. L. L.

[illegible]



DISTRIBUTION: T. Busch P. Graf  
D. Russler P. Rosenow  
L. Swaim F. Strelow  
P. Menning D. Schumaker  
C. Campshure L. Casey  
J. Plach

PREPARED BY

**KAL000051**

## 1968 SUMMARY OF BROKE PRODUCTION

DISTRIBUTION: T. Busch P. Graf  
D. Russler P. Rosenow  
L. Swaim F. Strelow  
P. Menning D. Schumaker  
C. Campshure L. Casey  
J. Plach

[illegible]

1968 Mrs. Valeriana Guejard  
Fruit Refraction

				Net	Imp.	Paid	Ret.
1	Allegre Rec	135000	163000	376000	20000	12000	
2	Anting Day	270000	140000	1000000	1000000	-	
3	Alt + Remun. L	10000	47000	83000	20000	43000	
4	My Remun. at	130000	38000	97000	70000	27000	
5	My Remun. at	125000	6550	-	-	-	
6	My Remun. at	125000	83000	58000	42000	18000	
7	My Remun. at	125000	125000	127000	117000	50000	
8	My Remun. at	125000	125000	127000	117000	50000	
9	My Remun. at	125000	125000	127000	117000	50000	
10	My Remun. at	125000	125000	127000	117000	50000	
11	My Remun. at	125000	125000	127000	117000	50000	
12	My Remun. at	125000	125000	127000	117000	50000	
13	My Remun. at	125000	125000	127000	117000	50000	
14	My Remun. at	125000	125000	127000	117000	50000	
15	My Remun. at	125000	125000	127000	117000	50000	
16	My Remun. at	125000	125000	127000	117000	50000	
17	My Remun. at	125000	125000	127000	117000	50000	
18	My Remun. at	125000	125000	127000	117000	50000	
19	My Remun. at	125000	125000	127000	117000	50000	
20	My Remun. at	125000	125000	127000	117000	50000	
21	My Remun. at	125000	125000	127000	117000	50000	
22	My Remun. at	125000	125000	127000	117000	50000	
23	My Remun. at	125000	125000	127000	117000	50000	
24	My Remun. at	125000	125000	127000	117000	50000	
25	My Remun. at	125000	125000	127000	117000	50000	
26	My Remun. at	125000	125000	127000	117000	50000	
27	My Remun. at	125000	125000	127000	117000	50000	
28	My Remun. at	125000	125000	127000	117000	50000	
29	My Remun. at	125000	125000	127000	117000	50000	
30	My Remun. at	125000	125000	127000	117000	50000	
31	My Remun. at	125000	125000	127000	117000	50000	
32	My Remun. at	125000	125000	127000	117000	50000	
33	My Remun. at	125000	125000	127000	117000	50000	
34	My Remun. at	125000	125000	127000	117000	50000	
35	My Remun. at	125000	125000	127000	117000	50000	
36	My Remun. at	125000	125000	127000	117000	50000	
37	My Remun. at	125000	125000	127000	117000	50000	
38	My Remun. at	125000	125000	127000	117000	50000	
39	My Remun. at	125000	125000	127000	117000	50000	
40	My Remun. at	125000	125000	127000	117000	50000	
41	My Remun. at	125000	125000	127000	117000	50000	
42	My Remun. at	125000	125000	127000	117000	50000	
43	My Remun. at	125000	125000	127000	117000	50000	
44	My Remun. at	125000	125000	127000	117000	50000	
45	My Remun. at	125000	125000	127000	117000	50000	

**PORTIONS OF THIS DOCUMENT HAVE  
BEEN REDACTED CONTAINS  
CONFIDENTIAL INFORMATION**